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MAR 21 1985

East Coast Chemical Disposal, Inc.
P. O. Box 627
SpringHouse, PA 19477

RE: EPA I.D. #PAD 98 070 6162

Gentlemen:

A review of our records indicates that Parts A and B of your RCRA Permit Application are currently under review by this office and the Pennsylvania Department of Environmental Resources.

On November 8, 1984 President Reagan signed and thus enacted the Hazardous and Solid Waste Amendments of 1984 (RCRA Reauthorization). The Amendments contain a number of far-reaching provisions that may impact the future operations of your facility.

We encourage you to stay abreast of developments relating to these new statutory provisions and we plan to provide further guidance to you as it becomes available. The purpose of this letter, however, is to begin implementation of one aspect of the new Amendments relative to corrective action for past or continuing releases.

Section 3004(u) of the amended Resource Conservation and Recovery Act now requires:

"...a permit issued after the date of enactment... shall require corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a Treatment, Storage or Disposal facility seeking a permit under the subtitle."

The "Hazardous Wastes" referred to in this section are those identified in regulation 40 C.F.R. Part 261. "Hazardous Constituents" are those listed in Appendix VIII of regulation 40 C.F.R. Part 261. Other relevant terms are defined in Attachment A to this letter.

CONCURRENCES

SYMBOL	3HW32	3HW32	3HW30	3HW00			
SURNAME	POTOSNAK	SOKOLOWSKI	ALLEN	WASERSUG			
DATE							

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EPA L.A. # PAD 98 070 6162

Mr. Miles B. Potter
Consulting Engineer
East Coast Chemical Disposal, Inc.
201 E. Tenth Street
Marcus Hook, PA 19061

Dear Mr. Potter:

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CONCURRENCE: 3HW32
POTOSNAK

pot for
2/28/85

3HW32
SOKOLOWSKI

pot for
2/28/85

3HW30
ALLEN

Allen
2/28

3HW00
WASSERSUG

Wassersug
3/1/85

P 155 265 969
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★ U.S.G.P.O. 1984-446-014

PS Form 3800, Feb. 1982

★ GPO: 1982-379-593

UNITED STATES
 ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 CHESTNUT BUILDING
 PHILADELPHIA, PA. 19107

OFFICIAL BUSINESS
 PENALTY FOR PRIVATE USE, \$300

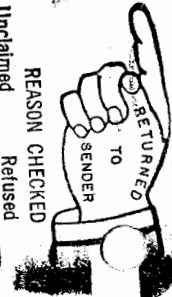
CERTIFIED
 P 155 265 823
MAIL

UNDEL

*P.O. Box 627
 Spring House PA 19477*

Mr. Miles B. Potter
 Consulting Engineer
 East Coast Chemical Disposal, Inc.
 201 E. Tenth Street
 Marcus Hook, PA 19064

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P 155 265 823

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Street and No. 201 E. Tenth Street	
P.O., State and ZIP Code Marcus Hook, PA 19061	
Postage	\$
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★ U.S.G.P.O. 1984-446-014

PS Form 3800, Feb. 1982

215 638 2973

your fee

In order to proceed with the permitting process, EPA and the State must first determine the location of all "Solid Waste Management Units" (See Attachment A for definition) at your facility. This requirement extends to both operating units as well as those that are closing or have been closed in the past. Next, we must determine whether or not any "releases" (see definitions) originated at these units. In order to enable us to make these determinations, you should provide the following information:

- (1) A topographic map showing the facility and a distance of 1,000 feet around it, at a scale of one inch equal to not more than 200 feet. In addition to showing the location of the hazardous waste management facilities for which you are seeking a permit, it must locate all existing and former Solid Waste Management Units (SWMU) at your facility.
- (2) For each SWMU, provide a description of the unit's functions, material of construction, dimensions, capacity, ancillary systems (piping), etc. If available, provide engineering drawings of the units and their foundations. For closed facilities, also provide a copy of the closure plan or a description of how closure was performed and any relevant post-closure information you have available.
- (3) For each SWMU, provide a description of all the wastes processed by the units with emphasis on hazardous wastes and hazardous waste constituents. Also, provide information on time frames and quantities processed.
- (4) For each SWMU, describe any release (or possible release) originating at the unit. This should include information on the date of release, type of hazardous waste or hazardous waste constituents, quantity released, nature of the release, extent of released migration, and cause of release (i.e. overflow, broken pipe, tank leak, etc.). Also, provide any available data which would quantify the nature and extent of environmental contamination including the results of soil and/or groundwater sampling and analysis efforts. Likewise, monitoring information that indicates releases are not present should also be submitted.

If the above requested information is contained in your Part B or has been previously submitted to this office, please reference this information in your reply.

We request under Section 3007 of the Act, 42 U.S.C. §6927, that you submit the above listed information within forty-five (45) days of your receipt of this letter to both EPA and the Pennsylvania Department of Environmental Resources. We recognize that in some cases, sufficient information will not presently be available to enable us to make corrective action determinations. For these cases, we plan to conduct on-site facility assessments and develop compliance schedules which would enable Permit Applicants to gather additional information leading to a corrective action decision under terms of a final effective RCRA Permit.

All information you submit should be certified as required by regulation 40 C.F.R. 270.11(d). Should you have any questions concerning this letter, please contact Mr. John Potosnak, P.E. at (215) 597-8338.

Sincerely,

Stephen R. Wassersug, Director
Hazardous Waste Management Division

Enclosure

cc: Mr. Donald Lazarchik, Director
Bureau of Solid Waste Management
Pennsylvania Department of
Environmental Resources

Definitions

Release - ...any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, but excluding releases otherwise permitted or authorized under law.

Solid Waste Management Unit -

...any landfill, surface impoundment, waste pile, land treatment unit, incinerator, tank (including storage, treatment, and accumulation tanks), container storage units, injection wells, wastewater treatment units, elementary neutralization units, transfer station, and recycling units that received solid or hazardous waste at any time.